



June 3, 1998

777 South Clinton Avenue  
PO Box 9457  
Rochester, NY 14604-0457  
Tel 716-461-4660  
Fax 716-461-3465

The Honorable William E. Kennard  
Chairman  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

Dear Chairman Kennard:

I am writing to express my concern over the Federal Communications Commission's Second Report and Order of February 20, 1997 which placed the Automobile Emergency Radio Service (AERS) frequencies in the newly created Industrial Business (I/B) pool.

Placing AAA's auto emergency frequencies in the I/B pool, without any coordination or protection, will be extremely detrimental to our provision of emergency road service. For that reason, AAA Rochester supports AAA's petition for reconsideration and its proposal to include auto emergency frequencies in the same quasi-public safety assignments as railroads and utilities.

AAA Rochester dispatches service vehicles to an average of 160,000 requests for emergency road service per year. We respond 365 days a year to vehicles blocking traffic, broken down on the interstate, or involved in any variety of accidents. Our members rely on us to provide prompt, safe and efficient service. Sharing frequencies in an I/B pool will inhibit our efforts to keep our area's roadways clear of safety hazards.

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We at AAA Rochester appreciate your time and attention to this matter, and respectfully request that the FCC grant AAA's petition for consideration.

Sincerely,

A handwritten signature in cursive script, reading 'Dorothy J. McKinnon'.

Dorothy J. McKinnon  
President/CEO

DJM/jvs



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The Honorable Harold W. Furchtgott-Roth  
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Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

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Federal Communications Commission  
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Washington, DC 20554

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Dorothy J. McKinnon  
President/CEO

DJM/jvs



Serving Members  
Since 1905

**Oregon/Idaho**

June 1, 1998

600 S.W. Market Street  
Portland, OR 97201  
503/222-6734  
Fax 503/222-6756

The Honorable William E. Kennard  
Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Chairman Kennard:

As you know, the Federal Communications Commission's Second Report and Order of February 20, 1997, placed the Automobile Emergency Radio Service (AERS) frequencies in the newly-created Industrial/Business pool. On behalf of the motoring public, AAA is very concerned about that decision.

Each year, AAA Oregon/Idaho receives nearly 600,000 calls for help from members stranded in hazardous situations. In fact, just last week one of our members was struck and killed by a car just minutes after his vehicle stalled on a busy freeway. Using our two-way radio communications system, we assisted the Oregon State Police and relayed information to our service provider in order to secure the scene.

The work we do is important, challenging and often dangerous. It requires constant focus, dedicated people and the best communications system available. We take our jobs seriously; after all, 16% of the entire US population are members of AAA.

For more than 50 years, AAA has relied on its two-way radio frequencies to assist local authorities by dispatching emergency service vehicles to stranded motorists. Placement of these frequencies in the I/B pool without any coordination protection is, at worst, reckless and, at best, ill-advised. In fact, we are already experiencing interference problems due to the new coordination rules. AAA has petitioned the FCC to grant these frequencies the same "public safety" status as petroleum, railroad, and utility companies. This will enable AAA to serve the motoring public without any adverse effect on private radio spectrum allocation and use.

I respectfully request that the FCC grant AAA's petition for reconsideration.

Thank you for your careful consideration.

Sincerely,

Roger L. Graybeal  
President & CEO  
(503) 222-6903

RECEIVED  
AAA

JUN 05 1998

OFFICE OF  
THE PRESIDENT

bcc: Robert L. Darbelnet

#### Officers and Directors

C. Edwin Francis, Chairman of the Board

A.W. Sweet, Vice Chairman of the Board

Terry W. Baker, Treasurer

Roger L. Graybeal, Secretary/President

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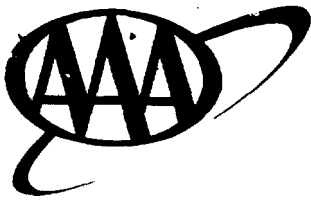
Randolph L. Miller  
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Richard G. Navarro  
Boise, Idaho

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Portland

Patricia C. Smullin  
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R. Thomas Yasui  
Hood River



May 29, 1998

The Honorable Harold W. Furchtgott-Roth  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

AAA West Penn/West Virginia  
AAA Motor Square Garden®  
5900 Baum Blvd.  
Pittsburgh, PA 15206-3854  
Tel 412/363-5100 • 1-800/441-5008  
Fax 412/362-6981

**Richard S. Hamilton**  
*President and  
Chief Executive Officer*

Dear Commissioner Furchtgott-Roth:

I am writing to reinforce AAA's concern over the Federal Communications Commission's Second Report and Order of February 20, 1997, which placed the Automobile Emergency Radio Service (AERS) frequencies in the newly created Industrial/Business (I/B) pool.

AAA West Penn/West Virginia serves 1,000,000 AAA members from Pennsylvania, Ohio and West Virginia. These members rely on us to meet their emergency road service needs. We respond to more than 570,000 requests from members for emergency road service, thirty percent of which are true emergencies presenting danger to life or property: a breakdown on the freeway, being locked out or stranded in a dangerous part of town or in a deserted area, clearing accidents from congested highways and streets.

My concern is that the placement of the auto emergency frequencies in the I/B pool, without any coordination protection, will be extremely detrimental to AAA's provision of emergency road service. In its recent petition for reconsideration, AAA proposed a very simple solution that would ensure roadside emergencies continue to be attended to without having any adverse effect on private radio spectrum allocation and use. AAA proposed that the auto emergency frequencies be given the same quasi-public safety treatment as railroads, petroleum, and utilities, whereby other coordinators would be required to request the use of a frequency before assigning it to a non-auto emergency use. The auto emergency frequency coordinator would then ensure that the assignment would not cause interference to existing emergency uses.

During the past two years, we have spent more than \$1,000,000 upgrading our computerized call center and dispatch system to increase our ability to respond to members efficiently and effectively during emergency situations. From our central location in Pittsburgh, we digitally dispatch more than 300,000 calls annually over our AERS frequencies. If these frequencies become congested, we will be forced to dismantle an extremely effective system that has dramatically improved our ability to respond to emergencies.

AAA has cited five specific reasons why our petition should be granted: (1) time is critical to emergency road service functions; (2) increasing interference and coordination problems have occurred under the current system; (3) emergency road service meets all the "quasi-public safety" characteristics cited by the FCC for railroads, power, and petroleum companies; (4) there will be a minimal impact on other radio frequency assignments; and (5) AAA emergency road service already has been recognized as a vital public safety service by Congress and many public safety entities.

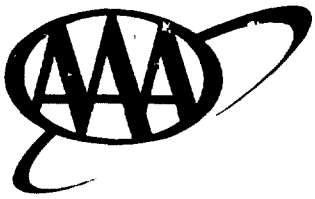
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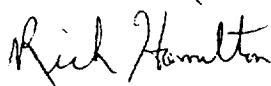
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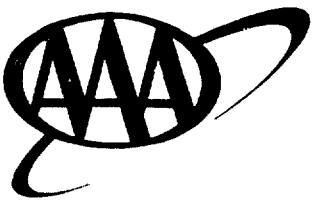
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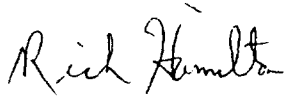
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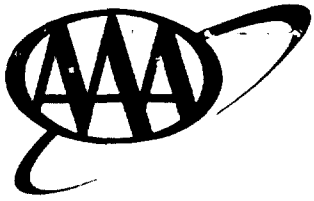
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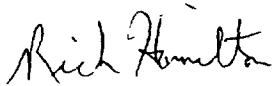
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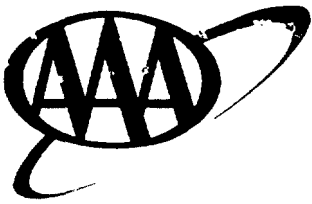
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May 26, 1998

12901 North Forty Drive  
Saint Louis, Missouri 63141  
314-523-7350  
[www.aaa.com](http://www.aaa.com)

The Honorable Michael K. Powell  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Commissioner Powell,

Each year more than 500 thousand of our more than 911 thousand members in Missouri, Arkansas, Southern Illinois, Eastern Kansas, Louisiana and Mississippi call upon our AAA club to provide emergency roadside assistance. In nearly one-third of these calls for aid, they are true emergencies involving danger to life and property.

Our roadside assistance is relied upon by public safety agencies to provide a rapid response to motorists involved in accidents, stalled on busy freeways, blocking traffic and even babies locked in cars. For us to respond to these emergencies we need to have clear radio communication channels with our service providers.

Our national AAA organization has asked that automobile emergency frequencies be granted the same "quasi-public safety" status as railroads, petroleum, and utilities enjoy. This simply will recognize that automobile emergencies are a safety concern so that the frequencies used to dispatch emergency roadside service will not be assigned if they will cause interference to the incumbent users. AAA emergency road service has already been recognized as a vital public safety service by Congress and many public safety entities.

On behalf of our 911 thousand members we respectfully request that the FCC grant AAA's petition for reconsideration.

Sincerely,

Kenneth A. Johnson  
President & CEO